

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
PES HOLDINGS, LLC, <i>et al.</i> ,)	Case No. 19-11626 (LSS)
Debtors.)	(Jointly Administered)
<hr/>		
PES HOLDINGS, LLC, <i>et al.</i> ,)	
Plaintiffs,)	
-and-)	Adversary Proceeding
ICBC STANDARD BANK PLC,)	
Intervenor-Plaintiff)	
v.)	Case No. 20-50454 (LSS)
ALLIANZ GLOBAL RISKS US INSURANCE)	
CO., <i>et al.</i> ,)	
Defendants.)	

**MOTION FOR PARTIAL SUMMARY JUDGMENT ON PLAINTIFFS' PROPERTY
DAMAGE CLAIMS**

The Insurers,¹ the defendants in this adversary proceeding, respectfully move for partial summary judgment on plaintiffs' claims for property damage. The grounds for this motion are fully set forth in the Memorandum of Law filed contemporaneously herewith.

Dated: September 20, 2021

¹ The Insurers submitting this Motion are listed on Annex 1 attached hereto.

HOGAN MCDANIEL

/s/ Garvan F. McDaniel

Garvan F. McDaniel [Del. Bar No. 4167]
1311 Delaware Avenue
Wilmington, Delaware 19806
Telephone 302-656-7540
gmdaniel@dkhogan.com

-and

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

Craig Goldblatt [Del. Bar No. 6665]
1875 Pennsylvania Avenue, NW
Washington, DC 20006
Telephone: 202-663-6000
craig.goldblatt@wilmerhale.com

Benjamin W. Loveland
60 State Street
Boston, MA 02109
Telephone: 617-526-6000
benjamin.loveland@wilmerhale.com

Counsel for Defendant Insurers

-and-

ZELLE LLP

Jonathan R. MacBride
1635 Market Street, Suite 1600
Philadelphia, PA 19103
Telephone: 484-532-5330
jmacbride@zelle.com

Mathew Gonzalez
45 Broadway, Suite 920
New York, NY 10006
Telephone 646-876-4410
mgonzalez@zelle.com

Co-Counsel for Defendant Insurers